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Hon. Katharine H. Parker  
United States Magistrate Judge  
United States District Court for the  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: Moore v. Kijakazi, Acting Commissioner of Social Security  
Docket No: 1:23-cv-07894-KHP

Hon. Judge Parker:

This letter respectfully requests an extension of time of sixty (60) days for Plaintiff to file Plaintiff's Brief in this matter, to February 5, 2024. Plaintiff's Brief is currently due on December 7, 2023; however, Plaintiff cannot complete the Brief on time.

Counsel requests this extension due to multiple, simultaneous filing deadlines. Counsel requires additional time to properly and thoroughly prepare Plaintiff's brief. For instance, between November 24, and January 31, 2023, staff in Counsel's office have one hundred and sixty-seven (167) Plaintiff briefs due. This figure does not include briefings which will be due after the filing of Administrative Records throughout this timeframe, Oral Arguments, appeals to Circuit Courts, Reply Briefs, settlement negotiations, and the various other tasks which arise throughout the course of litigation. These circumstances do not allow for Plaintiff's Counsel to properly prepare the brief by the current deadline. This request will not cause Defendant any undue hardship. This extension is needed to thoroughly and properly prepare the brief.

Plaintiff's counsel has contacted defense counsel who kindly consents to this request. This request will not cause Defendant any undue hardship. The parties have agreed on the below briefing schedule. This would be a first request for an extension of time in this matter.

If Plaintiff's request is granted, the new briefing schedule would be:

- **Plaintiff's Brief is due on or before February 5, 2024;**
- **Defendant's Brief is due on or before April 5, 2024; and**
- **Plaintiff's Reply Brief, if any, is due on or before April 19, 2024.**

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Thank you for your consideration.

Respectfully submitted,

/s/ Howard D. Olinsky

Howard D. Olinsky, Esq.  
Counsel for Plaintiff

CC [via ECF]: Heather Sertial, Esq., and Michael Corona, Esq. Attorneys for Defendant

**SO ORDERED.**

Dated: 12/4/2023

**APPLICATION GRANTED**

Katharine H Parker  
**Hon. Katharine H. Parker, U.S.M.J.**